

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost
Recovery Clause with Generating
Performance Incentive Factor

Docket No. 070001-EI

Submitted for Filing: August 14, 2007

**PEF'S OBJECTIONS TO OPC'S FIRST
SET OF INTERROGATORIES (Nos. 1-8)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rule 1.340 of the Florida Rules of Civil Procedure, and the Order Establishing Procedure in this matter, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to the Office of Public Counsel's ("OPC's") First Set of Interrogatories (Nos. 1-8) and states as follows:

GENERAL OBJECTIONS

With respect to the "Definitions" and "Instructions" in OPC's First Set of Interrogatories, PEF objects to any definitions or instructions that are inconsistent with PEF's discovery obligations under applicable rules. If some question arises as to PEF's discovery obligations, PEF will comply with applicable rules and not with any of OPC's definitions or instructions that are inconsistent with those rules. Furthermore, PEF objects to any interrogatory that calls for PEF to create data or information that it otherwise does not have because there is no such requirement under the applicable rules and law.

PEF objects to OPC's definition "(i)" given that it includes "affiliates" in the definitions of "PEF" and "Progress Fuels." PEF objects to any definition or interrogatory that seeks to encompass persons or entities who are not parties to this action or that are not subject to discovery under applicable rules.

PEF also objects to any Interrogatory or Request for Production that purports to require PEF or its experts to prepare studies, analyses, or to do work for OPC that has not been done for PEF, presumably at PEF's cost.

Additionally, PEF generally objects to OPC's interrogatories to the extent that they call for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law.

Finally, PEF reserves the right to supplement any of its responses to OPC's Interrogatories if PEF cannot locate the answers immediately due to their magnitude and the work required to aggregate them, or if PEF later discovers additional responsive information in the course of this proceeding.

By making these general objections at this time, PEF does not waive or relinquish its right to assert additional general and specific objections to OPC's discovery at the time PEF's response is due.

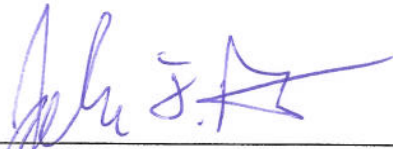
SPECIFIC OBJECTIONS

Interrogatory 1: Subject to the Company's general objections, and without waiving same, PEF objects to OPC's interrogatory number 1 because it is vague and ambiguous. PEF reads this interrogatory as calling for information regarding any company on PEF's Form 423-2 that is an affiliate of PEF or an affiliate of any entity procuring fuel on PEF's behalf. Subject to this interpretation, PEF will respond to interrogatory 1.

Interrogatory 2: Subject to the Company's general objections, and without waiving same, PEF objects to OPC's interrogatory number 2 to the extent it calls for information regarding entities that are not PEF or that are not acting on PEF's behalf. PEF also objects to the

information requested from January 1, 2005 through December 31, 2005, since such information is not relevant or material to any issue in this proceeding.

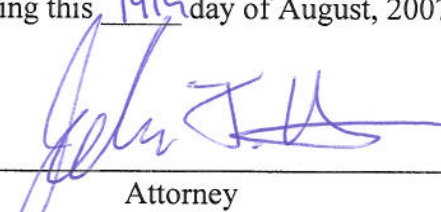
Interrogatory 7: Subject to the Company's general objections, and without waiving same, PEF objects to OPC's interrogatory number 7 as vague and ambiguous due to the use of the word "support" in that interrogatory.



John T. Burnett
Associate General Counsel
PROGRESS ENERGY SERVICE
COMPANY, LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5587
Facsimile: (727) 820-5519

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Progress Energy Florida, Inc.'s Objections to Citizens First Set of Interrogatories (Nos. 1-8), in Docket No. 070001-EI has been furnished by regular U.S. mail to the following this 14th day of August, 2007.



Attorney

James W. Brew
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson St. NW
8th Floor, West Tower
Washington, DC 20007-5201

Keino Young
Lisa Bennett, Esq.
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302

Susan D. Ritenour
One Energy Place
Pensacola, FL 32520-0780

Jeffrey A. Stone
Russell A. Badders
Steven R. Griffin
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32591

Norman Horton, Jr.
Messer, Caparello & Self, P.A.
P.O. Box 15579
Tallahassee, FL 32317

Florida Industrial Power Users Group
c/o John W. McWhirter, Jr.
McWhirter Reeves
400 North Tampa Street, Suite 2450
Tampa, FL 33602

Florida Power & Light Co.
Bill Walker
215 S. Mondroe Street, Suite 810
Tallahassee, Florida 32301

Ms. Paula K. Brown
Regulatory Affairs
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601-0111

Joseph A. McGlothlin, Esq.
Office of Public Counsel
111 W. Madison St., Room 812
Tallahassee, FL 32399

Ms. Cheryl Martin
Florida Public Utilities Company
P.O. Box 3395
West Palm Beach, FL 33402-3395

Florida Power & Light Co.
R. Wade Litchfield
John T. Butler
700 Universe Blvd.
Juno Beach, FL 33408-0420